



RECEIVED

JUL 15 2009

Public Disclosure
Commission

July 13, 2009

Vicki Rippie
Executive Director
Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

Re: Envision Spokane Political Committee

Dear Ms. Rippie:

Please consider this request that the Public Disclosure Commission immediately investigate disclosure and filing violations of the Envision Spokane Political Committee. Please find below a listing of the violations that have been observed as of July 13, 2009. Swift action to reprimand and bring this organization into compliance with RCW 42.17 is sought and expected.

While the Envision Spokane Political Committee filed as a single year committee, the entity has been operating as a political action committee as defined by RCW 42.17.020(39), by their own admission, for the past two years (see attachments 1 and 2). Their efforts resulted in a proposed ballot initiative to amend the Spokane City Charter (see attachment 3). Envision Spokane failed to file as political action committee until March 17, 2009, and has disregarded their responsibility to show the public the true source of contributions or beneficiaries of funds.

- The organization has been raising money for political purposes for an undetermined amount of time.
 - On January 5, 2009, at an Envision Spokane Board of Directors meeting, Thomas Linzey, general counsel for Envision Spokane indicated the group received a "grant" for \$500,000.
 - Mr. Linzey stated the funds were being used to pay for printing full color campaign materials (see attachment 4) and for canvassers to distribute literature. Literature drops commenced on January 5 and concluded on March 18, 2009.
 - The distributed literature does not include sponsor identification as required by RCW 42.17.510.
 - The revenue received to fund this effort and related expenditures have not been reported.
 - Envision Spokane was soliciting campaign funds on the above referenced literature and via their website (see attachment 5) during this time.
- On the campaign literature distributed between January and March 2009, it is states ten neighborhood councils had seats on their Board of Directors. This has been proven to be false.
 - At the time, not one of the neighborhood councils had voted to endorse their campaign or their process. Attachments 6, 7, and 8 are statements from the Rockwood, Hillyard, and West Central Neighborhood Councils to Envision Spokane expressing concerns regarding misrepresentations of support made on their campaign literature.
 - These falsifications of fact are violations of RCW 42.17.530. We believe the letters from the Neighborhood Councils would serve as clear and convincing evidence of this violation as required by RCW 42.17.530(2).
- Attachment 9 proves Envision Spokane named a Campaign Coordinator as far back as January 12, 2009, although Mr. Huschke's public role has remained the same since we began monitoring the organization in July 2008.
 - His salary should have been reported as an expenditure.

JUL 15 2009

Public Disclosure
Commission

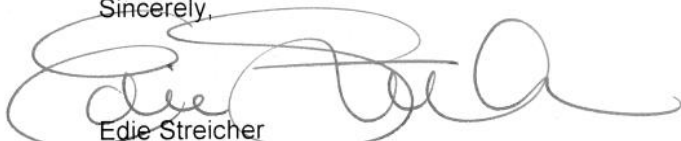
- The attachment also shows Shallen Dawson as the Town Hall Coordinator for Envision Spokane. Her salary would be reportable as an expenditure as well.
- According to the meeting minutes of the Envision Spokane Community Group Cluster (see attachment 10), Thomas Linzey has held multiple titles within the organization, including "Staff" and "Advisor".
 - His salary should have been reported as an expenditure.
 - We believe the minutes of these meetings serve as additional proof of political action activity, as the development of the initiative language was drafted during these meetings.
- During the January 5, 2009 Envision Spokane Board of Directors meeting, Thomas Linzey indicated their organization employed filmmaker Jeremy Kagan to direct a film for future use by their campaign.
 - On June 5, 2009, the Center for Justice hosted an Envision Spokane Film Meeting (see attachment 11).
 - The expense for this film, which would be considerable given the experience and credentials of Mr. Kagan (see attachment 12), has not been reported.

Since forming a political action committee, it would appear Envision Spokane continues to violate campaign finance laws. Possible violations include:

- Creation, maintenance, updating and soliciting funds on a website, www.envisionspokane.org with no PDC filing record of an expense for such actions.
 - The website was first registered on March 19, 2008.
 - The website does not include sponsor identification.
- Creation, distribution, and maintenance of signature gathering materials
 - Envision Spokane began gathering signatures on March 26, 2009 with no PDC filing record of an expense for the creation of the proposed ballot initiative or the printing of the petition for signature.
- Organization and hosting of community meetings to discuss the language of the Community Bill of Rights with no PDC filing record of an expense for communications, food, materials, etc.
- No record of expenses for staging political activists with clipboards, pens, tables, etc. at the multiple signature gathering events that have been held since March 2009.
- Creation and distribution of printed materials. There is a record of \$450.02 for printing, but that cost is too low for the design and printing of the full color brochures which have been distributed throughout Spokane (see attachment 13).
- No expenditures or in-kind contributions have been reported for political or legal staff and/or consultants.

Thank you for your consideration and prompt attention to this important matter.

Sincerely,



Edie Streicher
Government Affairs Director

cc: Vicki Dalton, Spokane County Auditor